

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
vs.)	Case No.: 4:16-cr-502 HEA
)	
DEBORAH PIERCE,)	
)	
Defendant.)	

FIRST MOTION TO CONTINUE SENTENCING

COMES NOW Defendant, Deborah Pierce, by and through counsel, and hereby moves this Court to continue the sentencing hearing presently scheduled for January 4, 2018 by a period of forty-five (45) days. In support of this motion, Defendant states as follows:

1. Defendant changed her plea to guilty in this matter on September 14, 2017.
2. Defendant is currently scheduled to be sentenced on January 4, 2018.
3. The plea agreement left certain restitution and loss determinations open for sentencing.
4. The parties continue to work on these matters in an effort to avoid a contested sentencing hearing.
5. For this reason, Defendant files the instant motion.
6. Defendant, through counsel, has discussed this matter with assistant United States attorney Thomas Albus. Mr. Albus has no objection to Defendant's request.

WHEREFORE, Defendant respectfully requests this Honorable Court continue the sentencing hearing presently scheduled for January 4, 2018 by a period of forty-five (45) days.

Respectfully submitted,

ROSENBLUM, SCHWARTZ & FRY, PC

By: /S/ Marc M. Johnson
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CERTIFICATE OF SERVICE

I hereby certify that on December 28, 2018, the foregoing was electronically filed with the Clerk of the Court to be served by operation of the Court's electronic filing system upon Mr. Thomas Albus assistant United States attorney.